

## REMARKS

Formal drawings are being submitted for the Examiner's approval in response to the objection to the drawings. Acceptance of these drawings is requested.

Claim 1 has been rejected as anticipated by Maguire (US Application 2003/0047322). The Examiner refers to Figure 5 of that reference. Figure 5 shows running a tubular into the wellbore and then expanding it. There is no ability to position it. If it were run into a horizontal section of the wellbore it would lay on the bottom. The method of claim 1 as filed indicated discrete steps of delivering and positioning. It appears that by citing this reference that the Examiner is taking the position that delivering is tantamount to positioning. Accordingly claim 1 now reflects that the tubular is delivered into the wellbore and then positioned after delivery in a manner that leaves an annular space around it. The Maguire reference has no facility to do this. Neither does Worrall (USP 5,348,095) in its Figure 7.

In Worrall Figure 2 the tubular is delivered. After that there is no way to position it after delivery as indicated in claim 1.

The Examiner then rejects claim 1 as obvious and combines two references to support this rejection. These references teach away from each other. The Wilson reference (USP 5,228,515) seeks to provide access through the pistons 50 after they are extended. The Wilson reference delivers the tubular and then repositions it, as illustrated in Figures 2 and 3. But what it does next is overlooked by the Examiner in combining this reference with Baugh (6,564,271). After the pistons are extended, the cement is poured. After the cement is poured, the production string is run in. It should be noted that the pistons are taught to be extended with internal pressure (Column 12 Lines 66-67 and Column 13 Lines 58-60). This reference does not teach expansion after extension of the pistons 50. That is why the Examiner pulls in the Baugh reference. However, this reference teaches injecting cement and then letting the casing "set while the production string is assembled and installed into the casing." (Column 13 Line 65 to Column 14 Line 28). This reference emphasizes that it removes the need to hurry up and run the production string into the casing because there is no fluid loss issue into the formation. There is no fluid loss because the formation is isolated until the extending plugs are destroyed. In the interim the cement sets. The access to the formation is through the

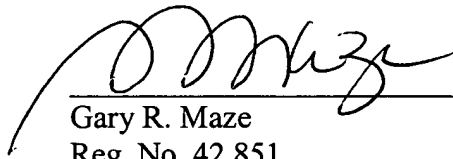
opening developed in the extending members that bridge the now set cement layer. This reference not only has no use for expansion but it suggests a method of operation that lets the cement set making subsequent expansion at minimum more difficult and for sure superfluous. The extending members bridge the cemented annulus and when opened up allow for production. There is no use in this reference for expansion of the tubular.

It bears mentioning that downhole expansion of tubular strings was not even a method in vogue at the time of the Wilson invention, which further supports that the Wilson technique had no use and could not have contemplated any benefit from tubular expansion. This is further supported by the recent vintage of the Baugh reference the Examiner selected to illustrate the general point of tubular expansion. While Baugh does teach attaching a tubular to another using expansion, the base reference fully fixated casing to the wellbore by letting cement set all around it. The Baugh technique cannot find application with the Wilson method that precludes expansion by teaching allowing the cement to set.

Claim 16 has been rewritten in independent form to secure the allowance of claims 16 and 17. All the claims are now submitted to be in allowable condition.

Respectfully submitted,

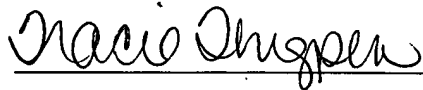
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